

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 3: 19 CR 4
)	
Plaintiff,)	JUDGE JAMES G. CARR
)	
v.)	
)	
ELIZABETH LECRON,)	<u>UNOPPOSED MOTION FOR</u>
VINCENT S. ARMSTRONG)	<u>PROTECTIVE ORDER</u>
)	
Defendant.)	

Now comes the United States of America, by and through counsel, Justin E. Herdman, United States Attorney for the Northern District of Ohio, and Michelle M. Baeppler, Assistant United States Attorney, and hereby submits this unopposed Motion for Protective Order agreed to by the parties governing the provision of discovery materials to Defendant pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure.

The proposed protective order is attached. Respective counsel for Defendants have indicated to the undersigned that they do not oppose the terms of the attached protective order, and have signed it, indicating their agreement and understanding of its terms. The undersigned has also signed the attached proposed orders, indicating her agreement and understanding of its terms.

WHEREFORE, the United States respectfully requests that this motion be granted and that the Court issue the attached proposed protective order.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

By: /s/ Michelle M. Baeppler
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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2019, a copy of the foregoing *Motion for Protective Order* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Michelle M. Baeppler

Michelle M. Baeppler

Assistant United States Attorney